



November 5, 2020

(Submitted electronically as Comment to LCFS Public Workshop)

Rajinder Sahota
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California Air Resources Board
1001 I Street
Sacramento, CA 95812

Subject: EDF comments to Staff Presentations Provided at the Oct 14-15, 2020, Low Carbon Fuel Standard Workshop

Ms. Sahota:

The Environmental Defense Fund (EDF) thanks the California Air Resources Board for the opportunity to provide comments following the October 14-15, 2020 LCFS Public Workshop.

In addition to the joint comments that EDF submitted with Oxy Low Carbon Ventures (OLCV) on October 30, 2020, EDF submits this supplemental comment in support of Section 5 of California Decarbonization Partnership's comments (submitted November 5, 2020) in this docket concerning amending the CCS Protocol. That section is consistent with our joint comments with OLCV, highlighting areas where protocol improvements could enhance the environmental integrity of the program and facilitate project development with secure geologic storage of CO₂.

Best Regards,

Adam Peltz
Senior Attorney, Energy
Environmental Defense Fund